

**QUINTAIROS, PRIETO, WOOD & BOYER, P.A.**

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**HARRIS & HARRIS, LTD.**

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

HUNTER CHURCH, individually and on behalf of those similarly situated; LUDWIG LAUDENCIA, individually and on behalf of those similarly situated; JEREMY GYRON, individually and on behalf of those similarly situated; JESSICA BELTRAN, individually and on behalf of those similarly situated,

Plaintiffs,

vs.

HARRIS & HARRIS, LTD., a foreign corporation; DOES I-V, inclusive; and ROE BUSINESS ENTITIES I-V, inclusive,

Defendant.

Case No.: 2:24-cv-00517-JCM-MDC

**STIPULATION AND ORDER TO  
EXTEND DEADLINE FOR DEFENDANT  
HARRIS & HARRIS, LTD. TO RESPOND  
TO PLAINTIFFS' COMPLAINT**

**[FIRST REQUEST]**

Plaintiffs HUNTER CHURCH, LUDWIG LAUDENCIA, JEREMY GYRON and JESSICA BELTRAN ("Plaintiffs") by and through their counsel Scott M. Holper, Esq. of the LAW OFFICES OF SCOTT M. HOLPER and Defendant HARRIS & HARRIS, LTD., by and through its counsel Michael Ayers, Esq. and Alia Najjar, Esq., of QUINTAIROS, PRIETO, WOOD & BOYER, P.A. ("Defendant"), hereby stipulate as follows:

1. On February 14, 2024, Plaintiffs filed their Class Action Complaint (the "State Court Complaint") in the Eighth Judicial District Court, Clark County, Nevada, under Case No.

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1 A-24-887131-C (the “State Court Action”).

2 2. On February 15, 2024, Plaintiffs filed their Motion to Certify Class in the State  
3 Court Action.

4 3. On February 15, 2024, Defendant filed its Notice of Removal (ECF No. 1), Civil  
5 Cover Sheet (ECF No. 1-1) and Certificate of Interested Parties (ECF No. 2) in the United States  
6 District Court, District of Nevada, under Case No. 2:24-cv-00517.

7 4. On February 15, 2024, Defendant filed its Notice of Removal in the State Court  
8 Action.

9 5. Defendant has not yet been served with the Complaint.

10 6. Counsel for Defendant contacted counsel for Plaintiffs and informed him that his  
11 firm had only just been assigned the defense of this matter and that his firm requires additional  
12 time within which to review this matter and formulate its defense.

13 7. Counsel for Defendant also agreed to accept service of the Summons and  
14 Complaint.

15 8. Accordingly, Plaintiffs and Defendant hereby stipulate to extend Defendant’s  
16 deadline to file its responsive pleading in this matter until and including April 22, 2024.

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RESPOND TO PLAINTIFFS’ COMPLAINT - 2

This is the first stipulation for extension of time for Defendant to respond to Plaintiffs' Complaint and is being made in good faith and not for the purpose of undue delay. No additional requests for extensions are contemplated.

**IT IS SO STIPULATED.**

DATED this 25<sup>th</sup> day of March, 2024.

DATED this 27<sup>th</sup> day of March, 2024.

**LAW OFFICES OF SCOTT M. HOLPER**

**QUINTAIROS, PRIETO, WOOD &  
BOYER, P.A.**

By: 

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**ORDER**

The Stipulation to Extend Deadline for Defendant HARRIS & HARRIS, LTD. to Respond to Plaintiffs' Complaint up to and including April 22, 2024, is so ORDERED AND ADJUDGED.

DATED: March 28, 2024

  
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Maximiliano D. Convillier III  
UNITED STATES MAGISTRATE JUDGE

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